

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHAEL WATSON, INDIVIDUALLY,  
AND AS FATHER AND NEXT FRIEND OF  
JOHN WATSON,

Plaintiff,

v.

HUSQVARNA PROFESSIONAL  
OUTDOOR PRODUCTS, INC.

Defendant.

CIVIL ACTION  
NO: 04-11782DPW

**PLAINTIFF'S PROPOSED SPECIAL  
JURY VERDICT FORM**

**PART I - NEGLIGENCE**

1. Was Husqvarna negligent with respect to its design or sale of the K2300EL saw used by Michael Watson on May 5, 2001?

YES \_\_\_\_\_ NO \_\_\_\_\_

**(If Yes, go to 2. If No, go to 6.)**

2. Was Husqvarna's negligence a substantial contributing factor in causing any injury to Michael Watson?

YES \_\_\_\_\_ NO \_\_\_\_\_

**(If Yes, go to 3. If No, go to 6.)**

3. Was Michael Watson negligent in connection with his operation of the K2300EL saw on May 5, 2001?

YES \_\_\_\_\_ NO \_\_\_\_\_

**(If Yes, go to 4. If No, go to 6.)**

4. Was any such negligence by Michael Watson a proximate cause of the accident?

YES \_\_\_\_\_ NO \_\_\_\_\_

**(If Yes, go to 5. If No, go to 6.)**

5. Please compare the negligence of Husqvarna and Michael Watson.

Negligence of Husqvarna	_____ %
Negligence of Michael Watson	_____ %
TOTAL NEGLIGENCE	100 %

**(Go to 6.)**

**PART II - BREACH OF WARRANTY**

6. Did Husqvarna breach any warranty with respect to the design or sale of the K2300EL saw?

YES \_\_\_\_\_ NO \_\_\_\_\_

**(If Yes, go to 7. If No, then contact the court officer. Note: If you answered Yes to 1 then you must answer yes to 6.)**

7. Was Husqvarna's breach of warranty a substantial contributing factor in causing any injury to Michael Watson?

YES \_\_\_\_\_ NO \_\_\_\_\_

**(If Yes, go to 8. If No, then contact the court officer. Note: If you answered Yes to 2 then you must answer yes to 7)**

**PART III - DAMAGES**

**Answer 8 only if any of the following are true:**

- You answered Yes to 1 and 2 **AND** answered Yes to 6 and 7 **OR**
- You answered Yes to 6 and 7.

8. What sum of money would fully and fairly compensate Michael Watson for his injuries?

\_\_\_\_\_ Dollars  
(amount in words)

**(Go to 9)**

\$ \_\_\_\_\_  
(amount in figures)

9. What sum of money would fully and fairly compensate John Watson for his loss of consortium?

\_\_\_\_\_ Dollars  
(amount in words)

\$ \_\_\_\_\_  
(amount in figures)

**(Once you have answered 8 and 9, contact the Court Officer)**

\_\_\_\_\_  
Signature of Foreperson of Jury

\_\_\_\_\_  
Print Name

DATED: \_\_\_\_\_